

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JEFF TITUS, individually;

Case No. 1:23-cv-00997-HYJ-SJB

Plaintiff,

Honorable Hala Y. Jarbou

v

Magistrate Judge Sally J. Berens

MICHAEL WERKEMA, in his individual capacity;  
ROBERT CINABRO, as personal representative  
of the Estate pf MICHAEL BROWN, in his individual  
capacity; jointly and severally,

Defendants.

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MUELLER LAW FIRM  
Wolfgang Mueller (P43728)  
*Attorneys for Plaintiff*  
41850 W. 11 Mile Road, Ste. 101  
Novi, MI 48375  
(248) 489-9653  
wolf@wolfmueллерlaw.com

ROSATI, SCHULTZ, JOPPICH &  
AMTSBUECHLER, P.C.  
Andrew J. Brege (P71474)  
Thomas D. Beindit (P81133)  
*Attorney for Defendant Estate of Michael Brown*  
822 Centennial Way, Ste. 270  
Lansing, MI 48917  
(517) 886-3800  
abrege@rsjalaw.com  
tbeindit@rsjalaw.com

CUMMINGS, MCCLOREY, DAVIS &  
ACHO, PLC  
Allan C. Vander Laan (P33893)  
Kristen L. Rewa (P73043)  
*Attorneys for Defendant Michael Werkema*  
2851 Charlevoix Drive SE, Ste. 203  
Grand Rapids, Michigan 49546  
(616) 975-7470  
avanderlaan@cmda-law.com  
krewa@cmda-law.com

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**DEFENDANT ESTATE OF MICHAEL BROWN'S MOTION FOR SUMMARY  
JUDGMENT**

**\*\*\* Oral Argument Requested \*\*\***

Defendant Robert Cinabro, as personal representative of the Estate of Michael Brown, moves for summary judgment under Fed. R. Civ. P. 56, for the reasons outlined in the attached brief in support. Co-Defendant Michael Werkema is simultaneously filing a motion for summary judgment on his behalf, and this Defendant incorporates by reference the arguments made by co-Defendant as related to Count 1, the only claim remaining against the Estate of Michael Brown.

On Wednesday, February 26, 2025, counsel discussed the relief requested in this motion, in accordance with Local Rule 7.1. While the parties could not agree on all relief, Plaintiff's counsel did agree to dismissal of Count 2, the civil conspiracy claim. A separate stipulation will be filed.

Respectfully submitted,

ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C.

/s/ Andrew J. Brege  
Andrew J. Brege (P71474)  
*Attorney for Defendant Estate of Michael Brown*  
822 Centennial Way, Suite 270  
Lansing, MI 48917  
(517) 886-3800  
abrege@rsjalaw.com

Dated: March 3, 2025

**PROOF OF SERVICE**

I hereby certify that on March 3, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record listed herein.

Respectfully submitted,

ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C.

/s/ Andrew J. Brege

Andrew J. Brege (P71474)

*Attorney for Defendant Estate of Michael Brown*

\822 Centennial Way, Suite 270

Lansing, MI 48917

(517) 886-3800

abrege@rsjalaw.com

Dated: March 3, 2025